

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

IN RE:  
TANG, SOO HYON

Case No. 21-18354 VFP

Debtor(s)

**APPLICATION FOR TRUSTEE'S COMPENSATION AND EXPENSES**

1. Applicant was appointed trustee of this bankruptcy estate on 10/27/21.
2. Applicant has performed all duties of the trustee as prescribed by Section 704 of the Bankruptcy Code.
3. Applicant requests compensation in the amount of \$8,703.41 for such services performed in accordance with Section 704 of the Bankruptcy Code.
4. Applicant certifies that the amount requested is not in excess of the limitations prescribed by Section 326 of the Bankruptcy Code.
5. Applicant requests reimbursement in the amount of \$0.00 for actual and necessary expenses incurred during the administration of this bankruptcy estate.

6. COMPUTATION OF COMPENSATION

Total disbursement to parties in interest, EXCLUDING DISBURSEMENT TO THE DEBTOR, are \$109,068.13. Pursuant to Section 326 of the Bankruptcy Code, compensation is computed as follows:

Percentages Used for Cases Filed after 10/23/94:

25% on 1 <sup>st</sup>	\$ <u>5,000</u>	=	\$ <u>1,250.00</u>
10% on next	\$ <u>45,000</u>	=	\$ <u>4,500.00</u>
5% on next	\$ <u>950,000</u>	=	\$ <u>2,953.41</u>
3% on balance over	\$ <u>1,000,000</u>	=	\$ <u>0.00</u>
Total Compensation		=	\$ <u>8,703.41</u>

7. TRUSTEE EXPENSES ITEMIZATION

Description of Expense	Amount of Expense
Bond Premium	\$ <u>0.00</u>
Travel	\$ <u>0.00</u>
Copies	\$ <u>0.00</u>

Postage	\$	<u>0.00</u>
Telephone	\$	<u>0.00</u>
Clerical	\$	<u>0.00</u>
Paralegal	\$	<u>0.00</u>
Supplies	\$	<u>0.00</u>
Distribution Expenses	\$	<u>0.00</u>
Professional Expenses	\$	<u>0.00</u>
Other	\$	<u>0.00</u>

WHEREFORE, Applicant requests approval of the payment of compensation in the amount of \$8,703.41 and reimbursement of expenses in the amount of \$0.00.

Dated: May 23, 2024

/s/ JEFFREY A. LESTER, TRUSTEE  
Jeffrey A. Lester, Trustee

IN RE: SOO HYUN TANG  
CHAPTER 7 TRUSTEE

May 23, 2024

For Professional Service Rendered through 5/22/2024

11/18/2021

JAL Attendance at Section 341(a) meeting (pro  
rata w/ other meetings); Corresp. w/  
Iannetti re docs needed;

11/23/2021

JAL Telephone conversation with Katzenstein,  
Esq. re status of matrimonial proceedings;

11/24/2021

JAL Receipt and review of correspondence from  
and to Ianetti re status of payments due  
under PSA; Review judgment; Corresp. w/  
Iannetti re need amendments to petition;  
Tel. conf. w/ Dan Tangk-Advised to get atty  
familiar w/bankruptcy language;

11/29/2021

JAL Telephone conversation with Daniel Tang  
(former spouse) re need for counsel and  
status of pending matrimonial issues;

12/03/2021

JAL Correspondence with Katzenstein, Esq. re  
have Daniel call re bk atty being retained;  
Tel. conf. w/ counsel re possible early buy  
out of amount due;

12/22/2021

JAL Correspondence with Katzenstein, Esq. re  
interest of ex-spouse (Daniel Tang) to buy  
out of obligations under divorce judgment;

12/30/2021

JAL Telephone conversation with Katzenstein,  
Esq. re advantages of settlement; Convert  
to asset case on computer;

01/03/2022

JAL Preparation of Asset Notice and set up file  
for administration;

01/13/2022

JAL Correspondence with Ianetti re amendment to  
Sched B&C;

01/14/2022

JAL Receipt and review of correspondence from  
and to counsel re review of permissible  
exemptions;

01/17/2022

JAL Receipt and review of correspondence from  
and to Ianetti, Esq. re possible applicable  
exemptions;

01/24/2022

JAL Receipt and review of correspondence from  
Clerk re status; Draft status report and  
submit to Court;

01/25/2022

JAL Correspondence with Ianetti, Esq. re  
exemptions to which debtor may be entitled;

01/27/2022

JAL Correspondence with Ianetti re extend of  
exemption claim;

01/28/2022

JAL Telephone conversation with debtor's  
counsel re re-compute exemption and  
possible filing of POCs for family debt;

02/03/2022

JAL Review amended Schedule F listing  
additional creditors (family members);  
Corresp. w/ and from Ianetti re Sched C;  
Corresp. w/ Katzenstein, Esq. re Daniel  
Tang offer diminishes over time;

02/07/2022

JAL Review amended A,B & C; Prep. objection to  
exemption and potential Stipulation  
settling issue; Corresp. w/ Ianetti re  
same; Update computer records with added  
assets and exemption claims;

02/11/2022

JAL Receipt and review of correspondence from  
and to Ianetti re signed stipulation; eFile  
with Clerk;

03/10/2022

JAL Revise Asset Notice; eFile with Clerk, etc.;

03/18/2022

JAL Review TD Retail POC;

03/28/2022

JAL Review POC filed by Obermayer Rebmann,  
Maxwell & Hippel (former attys) and tel.  
confs. w/ Turner Falk, Esq. re nature of  
secured portion of claim;

03/29/2022

JAL Review ADT Proof of Claim;

04/14/2022

JAL Review Wells Fargo POC;

05/09/2022  
JAL Review Verizon POC;

05/13/2022  
JAL Review 3 POCs by individual claimants;

05/23/2022  
JAL Receipt and review of correspondence from  
and to Turner Falk, Esq. re objection to  
family claims;

05/24/2022  
JAL Correspondence with and from Ianetti re  
awaiting backup to claims filed for  
apparent relatives; Tel. conf. w/ Turner  
Falk, Esq, re objecting to claims and  
possible PA lawyer if needed; Commence  
review of proposed proof as to family POCs;

05/25/2022  
JAL Finish review of proposed certification;  
Corresp. w/ Ianetti re additional  
information required;

06/09/2022  
JAL Review and reconcile filed and scheduled  
claims; Tel. conf. w/ Stretto re  
downloading missing claims; Corresp. to and  
from Ianetti re backup for family claims;

06/10/2022  
JAL Review imported assets and reconcile;

06/14/2022  
JAL Review claims from amended download and  
reconcile with previously imported claims;

06/20/2022  
JAL Revise computer records re realistically  
estimated TFR date;

07/21/2022  
JAL Review past email; Corresp. w/ Ianetti as  
to whether he has obtained proofs of amount  
claimed in POCs filed by family;

11/10/2022  
JAL Review substitution of atty for Obermayer;

12/01/2022  
JAL Review file; Corresp. w/ Ianetti, Esq re  
POC support; Corresp. w/ Katzenstein, Esq.  
re ED payment due in 1 year;

12/13/2022

JAL Review entered order for retention of counsel;

01/24/2023

JAL Review docket re hearing date for  
expungement motion;

01/27/2023

JAL Revise computer records re expunged claims;

02/02/2023

JAL Receipt and review of correspondence from  
Ianetti, Esq. re no contact with one of  
expunged creditors;

04/06/2023

JAL Review stay relief motion by Toyota;

06/21/2023

JAL Review file and PSA terms; Corresp. w/  
Katzenstein, Esq. re past communication and  
invitation for his client to resolve issue  
at this time;

07/11/2023

JAL Follow up with Katzenstein re no interest  
in resolution before end of year when due;

11/29/2023

JAL Correspondence with Katzenstein, Esq. re  
property settlement payment due now;

12/13/2023

JAL Receipt and review of correspondence from  
and to colleagues re attempt to locate PA  
atty to handle collection of equitable  
distribution;

12/14/2023

JAL Correspondence with Gary Seitz, Esq. re  
possible retention.

12/27/2023

JAL Review file; Corresp. w/ PA counsel to  
start process;

12/28/2023

JAL Telephone conversation with Holly Miller re  
proceed in NJ first before going to PA to  
collect;

01/02/2024

JAL Correspondence with and from Ianetti, Esq.  
re address for ex-H;

02/26/2024

JAL Correspondence with Ianetti in attempt to  
get info on ex-H;

02/29/2024

JAL Receipt and review of correspondence from  
from and to Iannetti re info necessary to  
get non-military cert;

03/05/2024

JAL Obtain non-military certification in prep  
for judgment application;

03/15/2024

JAL Telephone conversation to Daniel as to  
non-receipt of promised matrimonial  
pleadings; Review claims to determine  
requirements for 100% dividend; Research PA  
court; Corresp. w/ Chambers of James  
McMaster to attempt to determine status;  
Corresp. to and from Ianetti re same;

03/18/2024

JAL Receipt and review of correspondence from  
Daniel re form of notice received setting  
hearing date in PA;

03/19/2024

JAL Receipt and review of correspondence from  
and to Ianetti re meaning of and status of  
PA hearing on 3/28/24 and client's reaction  
to ownership of the proceeds; Review claims  
and advise counsel of effect of  
disallowance of matrimonial atty's claim;

03/20/2024

JAL Receipt and review of correspondence from  
and to Ianetti re debtor's representation  
in pending PA proceedings;

03/21/2024

JAL Receipt and review of correspondence from  
and to Ianetti re Debtor unrepresented in  
PA and intention to participate in hearing;

03/26/2024

JAL Telephone conversation with Alster, Esq. re  
PA hearing coming up and Dan may need  
representation after that;

03/27/2024

JAL Review file in anticipation of  
participation in PA matrimonial proceedings;

03/28/2024

JAL Telephone conversation and corresp. with  
Daniel re delivery of funds;

03/29/2024

JAL Telephone conversation with Daniel re will be sending payment and possible motion to have some returned;

04/01/2024

JAL Tel. conf. and correspondence with defendant re adjournment of pre-trial to 4/11;

04/03/2024

JAL Telephone conversation with Daniel Tang re debtor's admission that only \$140,000 was due;

04/05/2024

JAL Correspondence with Daniel re checks received;

04/08/2024

JAL Trustee Banking Activity re set up account, deposit \$200,000 eq. dist proceeds;

04/10/2024

JAL Trustee Banking Activity re confirm deposit and update receipt log;

04/12/2024

JAL Correspondence with Dan Tang re sending dismissal stip;

04/16/2024

JAL Receipt and review of correspondence from and to Ianetti re response to discrepancy between Petition and demand in PA court; Review file re background;

04/23/2024

JAL Correspondence with both Morrow and Ianetti to urge resolution of issue as to Daniel's entitlement to refund; Tel. conf. w/ Morrow re no appeal to be filed; Corresp. w/ Daniel Tang re intent to close case if no motion filed to submit late claim;

04/24/2024

JAL Correspondence with and from Chambers as to deferred fee due for filing of adversary; Banking activity re pay Clerk;

04/29/2024

JAL Review notice of hearing on atty compensation; Review file re timing and ex-H's claim; Corresp. w/ Ianetti re will pay exemption and close case;

04/30/2024

JAL Revise claims register with 7 Admin Claims; Corresp. w/ counsel re intent to submit exemption in amount calculated; Confirm amount and delivery of exemption;



05/01/2024

JAL Receipt and review of correspondence from  
Ianetti confirming exemption amount;  
Banking activity re draw check; Corresp. w/  
counsel delivering same;

05/08/2024

JAL Review claims re anticipated closing-draft  
proposed distribution including interest  
and surplus;

05/21/2024

JAL Review notice from court as to hearing on  
atty compensation; Review claims and clear  
prior computation in anticipation of TFR;

05/22/2024

JAL Review entered order for atty compensation;  
Update logs in anticipation of TFR and tel.  
confs/ w Stretto re compute surplus;

05/23/2024

JAL Preparation of TFR; Submission to UST;